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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ORLANDIS WELLS, M.D.,

Defendant.

Case No. 2:19-cr-00216-JAD- NJK

**STIPULATION TO CONTINUE
RESPONSE DEADLINE
(First Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between NICHOLAS A. TRUTANICH, United States Attorney, and PETER S. LEVITT, Assistant United States Attorney, counsel for the United States of America, Christopher Oram, counsel for Defendant Wells, stipulate that the government will have until February 21, 2020 to respond to the defendants pretrial motions. Defendant timely filed those motions (ECF Nos. 31, 32 and 34) on January 10, 2020. The responses are currently due January 24, 2020.

This stipulation is entered into for the following reasons:

1 1. Counsel for the government will be changing after January 17, 2020, and
2 incoming government counsel, AUSA Peter S. Levitt, needs additional time to learn the
3 case, review the discovery, and ensure that discovery disclosures have all been made, as
4 required.

5 2. The defendant is not in custody and does not object to the continuance.

6 3. Denial of this request for continuance could result in a miscarriage of justice.

7 4. The additional time requested by this Stipulation is made in good faith and
8 not for purposes of delay.

9 5. This is the first stipulated request for continuance of a motion deadline in this
10 case.

11 **DATED** this 17th day of January, 2020.

12
13 Respectfully submitted,

14 NICHOLAS A. TRUTANICH
15 United State Attorney

16 *s/ Peter S. Levitt*

17 _____
18 PETER S. LEVITT
19 Assistant United States Attorney

20 *s/ Christopher Oram*

21 _____
22 CHRISTOPHER ORAM
23 Counsel for ORLANDIS WELLS
24

1 **UNITED STATES DISTRICT COURT**
2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 ORLANDIS WELLS, M.D.,

7 Defendant.

Case No. 2:19-cr-00216-JAD- NJK

ORDER

8
9 **FINDINGS OF FACT**

10 Based on the pending Stipulation of counsel, and good cause appearing therefore, the
11 Court hereby finds that:

12 1. Counsel for the government will be changing after January 17, 2020, and
13 incoming government counsel, AUSA Peter S. Levitt, needs additional time to learn the
14 case, review the discovery, and ensure that the discovery disclosures have all been made, as
15 required.

16 2. Defendant filed pretrial motions (ECF 31, 32 and 34) on January 10, 2020.

17 3. The government's responses are currently due on January 24, 2020.

18 4. The defendant is not in custody and does not object to the continuance.

19 5. Denial of this request for continuance could result in a miscarriage of justice.

20 6. The additional time requested by this Stipulation is made in good faith and
21 not for purposes of delay.

22 7. This is the first stipulated request for continuance of a motion deadline in this
23 case.

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ORDER

THEREFORE, IT IS HEREBY ORDERED that

The Government shall have until February 21, 2020 to file response to

Defendant's pretrial motion at Docket No. 31.

IT IS SO ORDERED.


NANCY J. KOPPE
UNITED STATES MAGISTRATE JUDGE